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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

15 LAURA LEIGH, individually, and WILD
16 HORSE EDUCATION, a non-profit
corporation,

CASE NO. 3:23-cv-00568-ART-CSD

Plaintiffs,

V.

**JOINT MOTION AND STIPULATION
TO EXTEND THE DEADLINE FOR
FILING A MOTION FOR
ATTORNEYS' FEES**

19 UNITED STATES DEPARTMENT OF
20 INTERIOR, BUREAU OF LAND
21 MANAGEMENT, TRACY STONE-
22 MANNING, Director of the Bureau of Land
Management, and JON RABY, Nevada State
Director of the Bureau of Land Management,

Federal Defendants.

Pursuant to Local Rule IA 6-1, Plaintiffs Laura Leigh and Wild Horse Education and Defendants United States Department of Interior, Bureau of Land Management (BLM), Tracy

1 Stone-Manning, in her official capacity as Director of the BLM, and Jon Raby, in his official
2 capacity as Nevada State Director of the BLM, (collectively, the “Parties”), by and through
3 their undersigned counsel, hereby stipulate and respectfully request that the Court extend the
4 time to file any motions related to attorneys’ fees and costs by 30 days, until September 5,
5 2025. In support of this request, the Parties declare:

6 WHEREAS, on July 23, 2025, the Court issued an opinion and order on the Parties’
7 cross-motions for summary judgment. ECF No. 53.

8 WHEREAS, on July 23, 2025, judgment was entered by the Clerk of the Court. ECF
9 No. 54.

10 WHEREAS, pursuant to Rule 54(d)(2)(B), Plaintiffs must file a motion for attorneys’
11 fees and costs on or before August 6, 2025.

12 WHEREAS, Plaintiffs’ counsel is scheduled to be out of state for a long-planned
13 family vacation from July 27 to August 12,

14 WHEREAS, the parties have met and conferred to determine whether Defendants
15 would agree to extend the deadline for Plaintiffs to file their motion for attorneys’ fees by
16 thirty days to September 5, 2025.

17 WHEREAS, Defendants do not oppose this motion and hereby stipulate to the new
18 deadline for Plaintiffs’ motion as September 5, 2025.

19 WHEREAS, this is the first stipulation for an extension of time to file a motion for
20 attorneys’ fees and costs.

21 WHEREAS, it is well-established that the court has the inherent power to “control the
22 disposition of the causes on its docket with economy of time and effort for itself, for counsel,
23 and for litigants.” *Landis v. North Am. Co.*, 299 U.S. 248, 254 (1936); *CMAX, Inc. v. Hall*,
24 300 F.2d 265, 268 (9th Cir. 1962); *Leyva v. Certified Grocers of California*, 593 F.2d 857,
25 863-64 (9th Cir. 1979).

1 NOW, THEREFORE, IT IS STIPULATED BY AND BETWEEN THE PARTIES,
2 AND THE COURT ORDERS, AS FOLLOWS:

3 Upon entry of the Court's order, the deadline to file any motion for attorneys' fees
4 and costs is extended from August 6, 2025, until September 5, 2025.

5
6 IT IS SO STIPULATED.

7 Dated: July 28, 2025, Respectfully Submitted,

8 */s/ Jessica L. Blome*
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23 Attorney General
U.S. Department of Justice
Environment & Natural Resources Division

24 */s/ Joseph W. Crusham*
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Attorneys for Federal Defendants

IT IS SO ORDERED:

HON. ANNE R. TRAUM
UNITED STATES DISTRICT JUDGE

DATED: _____

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2025, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the District of Nevada using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system, which includes counsel of record for all parties in the case.

/s/ Jessica L. Blome
Jessica L. Blome
Attorney for Plaintiff